

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

SONY BMG CD
TECHNOLOGIES LITIGATION

CASE NO: 1:05-cv-09575-NRB

DECLARATION OF STEPHEN RAFF IN SUPPORT OF PLAINTIFFS' CLASS
COUNSELS' APPLICATION FOR ATTORNEYS' FEES AND REIMBURSEMENT OF
EXPENSES

I, STEPHEN T. RAFF, hereby declare as follows:

1. I am an attorney in good standing duly licensed and admitted to practice in the State of New Jersey. I am a partner of Raff & Raff LLP, counsel of record for Plaintiff DeMarco in *DeMarco v. Sony BMG*, Docket No. 1:05-10825. A true and correct copy of the online firm resume is attached hereto as Exhibit A and incorporated by reference herein.
2. I submit this declaration in support of Plaintiffs' Class Counsels' application for attorneys' fees and reimbursements of expenses in the above entitled matter. The testimony set forth in this declaration is based on first hand knowledge, about which I would and could testify competently in open court if called upon to do so, and on contemporaneously generated records kept in the ordinary course of business.
3. The total number of professional hours expended in the litigation by Raff & Raff, LLP is 46.9. The total lodestar amount for attorney's time expended by Raff & Raff LLP in

the course of the litigation, based upon current rates, is \$12,898.00. The chart attached hereto as Exhibit B was prepared by me and presents a summary of the time spent from November 10, 2005 through March 16, 2006 on the litigation by attorneys. The chart includes the name of each attorney who has worked on the case, his current hourly billing rate and the number of hours expended by each professional on the matter. The time reflected in this declaration was time actually spent, in the exercise of reasonable judgment, by the laws and staff involved, and includes, but is not limited to: communications by and between counsel and plaintiff; communications amongst co-counsel; drafting correspondence, emails, pleadings; review and responses to co-counsel's work, proposed settlements; conferences with co-counsel; and legal research. My firm was careful not to expend unnecessary hours and did not do duplicate work done by others.

I hereby declare that the foregoing statements made by me are true to the best of my knowledge. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: March 24, 2006

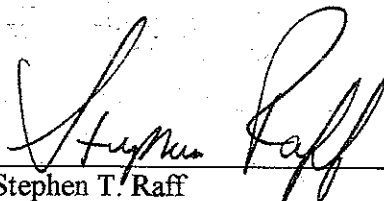

Stephen T. Raff

Exhibit A

RAFF & RAFF

PHILOSOPHY & OVERVIEW

RAFF & RAFF, LLP, is a law firm of trial lawyers dedicated to representing injured victims and their families. We are experienced and committed to always delivering outstanding service to our clients. Realizing that injuries cause a great deal of physical, as well as emotional pain, we strive to provide a personalized touch to our clients. Raff & Raff provides the legal assistance necessary to effectively prosecute claims for individuals and families from all walks of life. Since our beginning, our philosophy has been pragmatic and results-oriented. This has brought us a reputation of integrity, honesty, and effectiveness.

The firm offers the traditional benefits of a small law office complimented by the competitive edge gained with cutting-edge technology. We use a networked computer system, with detailed case management software, facilitating communication with our clients and adversaries and improving litigation and discovery tools. We additionally benefit from our use of technology in the courtroom. During every trial, we use our laptops and projectors to effectively communicate to the jury.

HISTORY & ATTORNEYS

We have been in existence in downtown Paterson, New Jersey since 1922. The firm was founded by Samuel Raff, Esq. who was later joined by his son, Donald Raff, Esq. in 1964. The firm expanded and was then joined by Robert Passero, Esq., who is no longer with the firm, but is presently the Assignment Judge of the Passaic County Superior Court, Paterson, New Jersey. The firm presently consists of four attorneys and three legal assistants: Donald L. Raff, Esq., Michael S. Raff, Esq., Stephen T. Raff, Esq. and Juok Pae, Esq.

Donald L. Raff, Esq. graduated with a B.A. from University of Pennsylvania and received a J.D. from NYU School of Law.

Michael S. Raff, Esq. graduated Magna Cum Laude/Phi Beta Kappa with a B.A. from NYU and received a J.D. from Fordham School of Law.

Stephen T. Raff, Esq. graduated Cum Laude from NYU with a B.A. and received his J.D. from Cardozo School of Law.

Juok Pae, Esq. graduated from St. John's College with a B.A. and her J.D. from Cardozo School of Law.

Exhibit B

Stephen Raff	Activity	Time @ \$275	Value
11/10/2005	consult with demarco	1	275
11/10/2005	consult with mike raff	1	275
11/12/2005	meeting with demarco	2	550
11/14/2005	meeting with demarco	4	1,100
11/14/2005	conf w/co counsel	3.5	962.5
11/14/2005	review emails and research	0.5	137.5
11/14/2005	telephone w/co counsel	0.3	82.5
11/14/2005	travel to conf w/co counsel	1	275
11/15/2005	meeting with demarco	1	275
11/16/2005	review emails and research	0.5	137.5
11/16/2005	telephone w/ PT	0.2	55
11/16/2005	telephone w/ PT and MH	0.2	55
11/17/2005	review complaint; email	0.5	137.5
11/17/2005	telephone w/co counsel	0.5	137.5
11/17/2005	review complaint	1	275
11/18/2005	review emails and research	0.5	137.5
12/2/2005	telephone w/co counsel	0.8	220
12/2/2005	telephone w/co counsel	0.8	220
12/5/2005	email; transfer of case	0.5	137.5
12/5/2005	meeting with demarco	2	550
12/9/2005	email; transfer of case	0.5	137.5
12/10/2005	email; transfer of case	0.3	82.5
12/11/2005	email; transfer of case	0.3	82.5
12/11/2005	conf w/co counsel; transfer	0.4	110
12/12/2005	phone with demarco; transfer	1	275
12/15/2005	email; PT	0.2	55
12/16/2005	email; transfer of case	0.2	55
12/19/2005	email; transfer of case	0.2	55
12/19/2005	email; settlement	0.2	55
12/21/2005	lodestar / time sheet	0.5	137.5
1/6/2006	email; settlement	0.2	55
1/9/2006	email; settlement	0.2	55
1/17/2006	Review and Speak to demarco re; settlement	0.5	137.5
2/2/2006	Review Riccati objection	0.3	82.5
2/3/2006	email; re Riccati	0.5	137.5
2/17/2006	review settlement	0.4	110
2/17/2006	email re: settlement	0.2	55
2/27/2006	conference with co-counsel	0.3	82.5
2/27/2006	conference with co-counsel	0.3	82.5
3/16/2006	conference with co-counsel	0.5	137.5
3/16/2006	conference with co-counsel	0.5	137.5
Total for Stephen Raff		29.5	\$8,113

Michael Raff	Activity	Time @ \$275	Value
11/10/2005	consult with steve raff	1	275
11/14/2005	conf w/co counsel	3.5	962.5
11/14/2005	review emails and research	0.5	137.5
11/14/2005	telephone w/co counsel	0.3	82.5
11/14/2005	travel to conf w/co counsel	1	275
11/15/2005	meeting with demarco	1	275
11/16/2005	review emails and research	0.5	137.5
11/17/2005	review complaint; email	0.5	137.5
11/17/2005	telephone w/co counsel	0.5	137.5
11/17/2005	review complaint	1	275
11/18/2005	review emails and research	0.5	137.5
12/2/2005	telephone w/co counsel	0.8	220
12/2/2005	telephone w/co counsel	0.8	220
12/5/2005	email; transfer of case	0.5	137.5
12/9/2005	email; transfer of case	0.5	137.5
12/10/2005	email; transfer of case	0.3	82.5
12/11/2005	email; transfer of case	0.3	82.5
12/11/2005	conf w/co counsel; transfer	0.4	110
12/16/2005	email; transfer of case	0.2	55
12/19/2005	email; transfer of case	0.2	55
12/19/2005	email; settlement	0.2	55
12/21/2005	lodestar / time sheet	0.5	137.5
1/6/2006	email; settlement	0.2	55
1/9/2006	email; settlement	0.2	55
2/2/2006	Review Riccati objection	0.3	82.5
2/3/2006	email; re Riccati	0.5	137.5
2/17/2006	review settlement	0.4	110
2/17/2006	email re: settlement	0.2	55
2/27/2006	conference with co-counsel	0.3	82.5
2/27/2006	conference with co-counsel	0.3	82.5
Total for Michael Raff		17.4	\$4,785.00
Total - Firm			\$12,898.00